

**From:** [Cora, Lori](#)  
**To:** ["Vrooman Gary L"](#)  
**Subject:** RE: Portland Harbor Revised ARARs tables  
**Date:** Thursday, July 23, 2015 10:29:02 AM

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Thanks, Gary. Can you please have DEQ provide more explanation as to its rationale why each that of these operating criteria are relevant to an in-water confined disposal facility that is not designed to be impervious on the sides, all waste disposed of in it would be covered by water and would be placed in the CDF from a barge on the water side. Only capping soils might be dumped from upland.

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**Lori Houck Cora** | Assistant Regional Counsel  
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**From:** Vrooman Gary L [<mailto:Gary.L.Vrooman@doj.state.or.us>]  
**Sent:** Wednesday, July 22, 2015 4:55 PM  
**To:** Cora, Lori  
**Subject:** RE: Portland Harbor Revised ARARs tables

Hi Lori,

DEQ believes the following subsections from OAR 340-095-0020, "operating criteria," are also substantive requirements that would be relevant to a CDF:

- 5 Leachate
- 7 Drainage Control
- 10 FloodPlains
- 11 Cover material
- 12 Cover frequency
- 13 Access Roads
- 14 Access Control
- 15 Site Screening
- 18 Truck Washing
- 17 Signs
- 21 Litter
- 22 Vector and Bird Control

Some of these like leachate, drainage control and flood plain requirements may be covered by other federal ARARs.

**Gary Vrooman**  
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**From:** Cora, Lori [<mailto:Cora.Lori@epa.gov>]  
**Sent:** Monday, July 13, 2015 12:28 PM  
**To:** Vrooman Gary L  
**Cc:** Koch, Kristine; Sheldrake, Sean  
**Subject:** Portland Harbor Revised ARARs tables

Hi, Gary. Attached are revised ARARs tables for the Portland Harbor FS. We have added to action-specific ARAR table the solid waste regulations relevant to a non-municipal solid waste landfill that DEQ identified and EPA found to be relevant and appropriate. Also, given that the FS alternatives include the possibility that the transloading facility where dredged materials would be staged (stored) and, if hazardous waste, possibility treated prior to shipment off-site, we have added references to several more RCRA accumulation, and hazardous waste storage, treatment and closure regulations. We have noted the Oregon citations where federal RCRA haz. waste requirements were adopted by the state. We have added some of Oregon's requirements that are broader than RCRA. However, please let us know if there are any other state hazardous waste requirements for the storage, treatment or closure that are more stringent than Part 264 that should be added to the tables. If DEQ could let us know if there are any other state ARARs before July 22<sup>th</sup>, we will have time to discuss them if needed and finalize the tables before the July 29 when FS Chapter 3 will be provided to the LWG. Thanks.

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